

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Megan Nelson on behalf of herself and all  
others similarly situated,

CIVIL NO. 15-CV-2661 (SER)

Plaintiffs

v.

**STIPULATION FOR  
EXTENSION OF TIME  
TO ISSUE ACCOUNT CREDITS**

BMW Financial Services NA, LLC, d/b/a  
Alphera Financial Services, All Wheels  
Recovery, Inc., and John Doe Repossession  
Agencies 1-10

Defendants.

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Plaintiff Megan Nelson, on behalf of herself and the Settlement Class (“Plaintiff”), and defendants BMW Financial Services NA, LLC (“BMW FS”) and All Wheels Recovery, Inc. (collectively, with BMW FS and Plaintiff, the “Parties”), hereby stipulate to extend the deadline for BMW FS to issue Account Credits pursuant to the terms of the Settlement Agreement and in support thereof state as follows:

WHEREAS, on March 8, 2017, the Court issued its Final Approval Order wherein the Court finally approved the Settlement, including the plan of distribution for the Settlement Fund (Dkt. No. 68, ¶¶ 6, 8);

WHEREAS, on May 2, 2017, the Court issued an Order on Plaintiff’s Motion for Attorney’s Fees, Costs and Class Representative’s Incentive Award (Dkt. No. 70);

WHEREAS, pursuant to the terms of the Settlement Agreement and the Court’s orders, the following deadlines govern distribution of the Settlement Fund:

- June 15 – Deadline for BMW FS to transfer funds to Settlement Administrator for attorney’s fees and incentive award;
- June 16 – Deadline for BMW FS to issue Account Credits;
- June 30 – Deadline for BMW FS to transfer all remaining Settlement Funds to Settlement Administrator; and
- July 14 – Deadline for Settlement Administrator to mail cash awards to eligible Settlement Class Members;

WHEREAS, in order to ensure that the Settlement Fund is properly distributed, BMW FS requested that the deadline to issue Account Credits be extended through and until June 30, 2017; and

WHEREAS, to keep the Settlement Class informed of the deadlines, the Parties agree to post an update to the Settlement Website with the upcoming deadlines.

NOW, THEREFORE, the Parties hereby stipulate, through their undersigned attorneys, that the deadline for BMW FS to issue Account Credits be extended through and until June 30, 2017. No other deadlines will be impacted by this Stipulation. The

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Parties further agree to instruct the Settlement Administrator to post on update on the Settlement Website of the upcoming deadlines.

Respectfully submitted,

Dated: June 13, 2017

CONSUMER JUSTICE CENTER, P.A.

By s/ Thomas J. Lyons, Jr.  
Thomas J. Lyons, Jr. (#0249646)  
367 Commerce Court  
Vadnais Heights, Minnesota, 55127  
Telephone: (651) 770-0707  
Facsimile: (651) 704-0907  
tommycjc@aol.com

ATTORNEYS FOR PLAINTIFF AND THE  
SETTLEMENT CLASS

Dated: June 13, 2017

STROOCK & STROOCK & LAVAN LLP

By s/ Arjun P. Rao  
Julia B. Strickland (Pro Hac Vice)  
Arjun P. Rao (Pro Hac Vice)  
2029 Century Park East  
Los Angeles, CA 90067-3086  
Telephone: (310) 556-5800  
Facsimile: (310) 556-5959  
jstrickland@stroock.com  
arao@stroock.com

NILAN JOHNSON LEWIS PA  
Douglas L. Elsass  
120 S. 6th Street, Suite 400  
Minneapolis, MN 55402  
Telephone: (612) 305-7500  
Facsimile: (612) 305-7501  
ssiegal@nilanjohnson.com  
dwarden@nilanjohnson.com

ATTORNEYS FOR DEFENDANT BMW  
FINANCIAL SERVICES NA, LLC

Dated: June 13, 2017

NILAN JOHNSON LEWIS PA

By s/ Stanley E. Siegel

Stanley E. Siegel (#199552)

David J. Warden (#393474)

120 S. 6th Street, Suite 400

Minneapolis, MN 55402

Telephone: (612) 305-7500

Facsimile: (612) 305-7501

ssiegel@nilanjohnson.com

dwarden@nilanjohnson.com

ATTORNEYS FOR DEFENDANT ALL  
WHEELS RECOVERY, INC.